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 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
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 GOLDBERG, J.H. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920214 ltr re violations noted in insp rept
 50-335/91-18 & 50-389/91-18. Corrective actions: complete
 testing for Unit 1 within 60 days of start up from Cycle 13
 refueling outage scheduled for Fall 1994.

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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
Response to Inspection Report 91-18

Inspection Report 91-18 documented the results of the Nuclear Regulatory Commission (NRC) inspection of Florida Power and Light (FPL) in the area of Generic Letter 89-10 "Safety Related Motor Operated Valve (MOV) Testing and Surveillance." The NRC requested a written response on two concerns. The first concern was "...that the schedule recommended by the generic letter will not be met due to delays resulting from the licensee's recent decision to alter its diagnostic test method because of deficiencies disclosed in the previous method through recent industry testing." The second concern was "...that differential pressure and flow testing was omitted for several valves in a group and was being considered for an additional group, even though these valves could have been tested..."

FPL would like to revise the schedule for GL 89-10 testing. FPL would complete testing for Unit 1 within 60 days following the start-up from the Cycle 13 refueling outage scheduled for the fall of 1994 and for Unit 2 within 60 days following the start-up from the Cycle 9 refueling outage scheduled for spring of 1995. We believe this extension is justified based upon the following considerations.

Unit 1 - Insufficient time existed between FPL's receipt of GL 89-10 (July 18, 1989) and the start of the next refueling outage (January 22, 1990) to properly develop and plan for the testing requested by the generic letter.

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an FPL Group company

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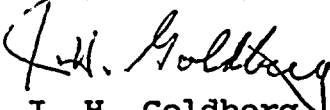
St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Response to Inspection Report 91-18
Page two

Unit 2 - MOV testing performed during the next refueling outage (fall, 1990) was performed using MOVATS TMD equipment and technology. During the summer of 1991, INEL testing revealed the inaccuracies with this type of test equipment. As a consequence, the first refueling outage testing was inadequate for the purposes of meeting the requested testing of GL 89-10.

Regarding the second concern, FPL has included all Bulletin 85-03 valves into the GL 89-10 program and will test all valves in the program where practicable.

Should there be any questions, please contact us.

Very truly yours,


J. H. Goldberg
President
Nuclear Division

DAS:JHW:ré

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

DAS/PSL #620-92

