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SUBJECT: Documents request for temporary waiver of compliance from TS
 4.6.1.1.a.1, "Containment Vessel Integrity" until emergency
 TS amend submitted. Waiver would suspend 31-day SR to verify
 that all penetrations closed by manual valves.

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February 12, 1993

L-93-042
10 CFR 50.36

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

Gentlemen:

RE: St. Lucie Unit 1
Docket No. 50-335
Temporary Waiver of Compliance

This letter documents a request of the Nuclear Regulatory Commission (NRC) for a Temporary Waiver of Compliance of Unit 1 Technical Specification 4.6.1.1.a.1., "Containment Vessel Integrity." This waiver is necessary until an emergency technical specification amendment is submitted by Florida Power and Light company (FPL) and approved by the NRC.

Specifically, this waiver would suspend the 31 day surveillance requirement to verify all containment vessel penetrations are closed by manual valves, blind flanges, or deactivated automatic valves secured in their positions inside containment. It is not possible to perform the surveillance on all the required penetrations at power because some are inaccessible. All other Technical Specification requirements will remain in effect.

On February 11, 1993 a telephone conversation between FPL and the NRC regarding FPL letter L-93-005 "Reply to Notice of Violation," dated January 20, 1993 was held. The result of this conversation was a new interpretation for FPL of what valves constitute containment isolation valves. This new interpretation adds many new penetration components which would need to be verified per our current technical specifications on unit 1. Some of these new components are inaccessible or are in areas of high radiation fields. A temporary waiver of compliance is necessary to avoid dose to those employees who would be required to check these valves until an emergency technical specification change is submitted by FPL and approved by the NRC.

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The emergency technical specification change will be submitted to delete the requirement to check penetration components inside the containment every 31 days and is valid for cycle 11 only. Following the submittal of the emergency change, a technical specification amendment will be submitted that will revise the unit 1 technical specifications to be like the unit 2 technical specifications. The technical specifications for Unit 2 do not require the surveillance of valves inside containment every 31 days.

As compensatory measures FPL will:

1. Inform all station operators via the night orders of the need to maintain strict and absolute control over entries into the containment.
2. Brief all Unit 1 containment entry teams prior to entry concerning the importance of ensuring containment penetration isolation valves are left in their required position.

The safety significance and the potential consequences associated with this proposed request are minimal. The bases for this conclusion are:

1. Following Unit 1's last refueling, during COLD SHUTDOWN, all valves, flanges and capped test connections were verified to be closed or installed prior to entry into MODE 4 where CONTAINMENT INTEGRITY is required. These conditions were verified using system valve lineup procedures, local leak rate post test valve lineups and the containment integrity surveillance valve lineup which existed at that time. Additionally, a recent visual inspection was conducted of all accessible containment vessel penetrations. Many of the systems contained herein are flooded or high energy systems which if breached would be detected either through instrumentation showing fluid leakage into the containment or increased radiation levels. Neither of these conditions exist.

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2. Containment access is restricted physically by locked hatches and annunciated in the control room when any containment hatch is opened. During this cycle entries into Unit 1 containment have been restricted to anomaly inspections, 2 per month, that inspect the accessible areas of containment for any unusual conditions. Unit 1 containment was also accessible during a brief outage to replace a pressurizer code safety valve. The scope of work during this outage was limited and configuration control on all plant systems was controlled through the equipment clearance order procedure or the locked valve deviation log. Neither the anomaly inspections or the outage activities reduced the effectiveness of CONTAINMENT INTEGRITY. The probability of a valve misalignment is small.

3. NUREG-1432 "Combustion Engineering Standard Technical Specifications" page B 3.6-29, states it is appropriate not to perform a surveillance of isolation valves inside containment every 31 days "since these valves and blind flanges are operated under administrative control and the probability of their misalignment is low."

4. The compensatory measures described above will maintain an additional level of assurance that containment integrity is preserved.

Florida Power and Light has determined that this request does not involve a significant hazards consideration.

1. Operation of the facility in accordance with the proposed waiver would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The compensatory measures associated with strict control of containment entries and the assurance of current valve position described above maintain an assurance that containment integrity is preserved. Therefore, the probability or consequences of an accident previously evaluated has not increased.

2. Operation of the facility in accordance with the proposed waiver would not create the possibility of a new or different kind of accident from any accident previously evaluated.

No changes to the physical plant have occurred which would create the possibility of a new or different kind of accident.

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3. Operation of the facility in accordance with the proposed waiver would not involve a significant reduction in a margin of safety.

The penetration components inside containment are operated under administrative control and the entries into containment are restricted. Compensatory actions associated with the briefing of containment entry teams ensures the probability of misalignment is low. Therefore, there is no reduction in a margin of safety.

Suspension of this 31 day surveillance does not involve irreversible environmental consequences. This temporary waiver of compliance does not result in a physical change to the plant or a change in the procedures used to operate the facility. Therefore, issuance of this waiver will not place the plant in a condition that compromises the health and safety of plant personnel or the general public.

This Temporary Waiver of Compliance was reviewed by the Facility Review Group on February 12, 1993.

Very truly yours,

D. A. SAGER

By *A. J. Boissy*
D. A. Sager
Vice President
St. Lucie Plant

DAS/JWH/kw
DAS/PSL #862-93

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