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ACCESSION NBR: 9303110270    DOC.DATE: 93/03/05    NOTARIZED: YES    DOCKET #  
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50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.    05000389  
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SUBJECT: Forwards responses to NRC Bulletin 90-001, Suppl 1, "Loss of Fill-Oil in Transmitters Mfg by Rosemount."

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March 5, 1993

L-93-61  
10 CFR 50.4  
10 CFR 50.54 (f)

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

RE: St. Lucie Unit Nos. 1 and 2  
Docket No. 50-335 and 50-389  
NRC Bulletin 90-01 Supplement 1 Response


The Florida Power and Light Company (FPL) responses to NRC Bulletin (NRCB) 90-01, Supplement 1 "Loss of Fill-oil in Transmitters Manufactured By Rosemount" for St. Lucie Units 1 and 2 are attached.

This NRCB supplement updated information provided in the original NRCB 90-01 dated March 9, 1990. This supplement requested recipients to review the information for applicability to their facilities and modify, as appropriate, their action and enhanced surveillance programs as describe in this NRCB supplement. A response was requested within 60 days of receipt of the supplement.

The attached information is provided pursuant to the requirements of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f).

Please contact us if there are any questions about this submittal.

Very truly yours,

  
D. A. Sager  
Vice President  
St. Lucie Plant

DAS/GRM/kw

DAS/PSL #876-93

Attachments

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

*JE39*

St. Lucie Units 1 and 2  
Docket No. 50-335 and 50-389  
NRC Bulletin 90-01 Supplement 1

STATE OF FLORIDA            )  
                                  )  
COUNTY OF ST. LUCIE    )            ss.

D. A. Sager being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant for the Nuclear Division 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.

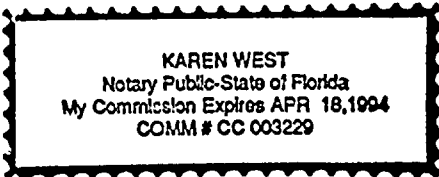
*D. A. Sager*  
D. A. Sager

STATE OF FLORIDA  
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 5<sup>th</sup> day of March, 1993 by D. A. Sager, who is personally known to me and who did take an oath.

*Karen West*  
KAREN WEST  
Name of Notary Public

My Commission expires 4-18-94  
Commission No. EC 003229



St. Lucie Units 1 and 2  
Docket No. 50-335 and 50-389  
NRC Bulletin 90-01 Supplement 1

ATTACHMENT

REPORTING REQUIREMENT 1:

A statement whether the licensee will take the actions requested in the supplement:

FPL RESPONSE TO REPORTING REQUIREMENT 1:

FPL intends to implement the Requested Actions Items 1 and 2 in the NRCB supplement as described below.

REPORTING REQUIREMENT 2:

With regard to the actions requested in the bulletin supplement that the licensee is taking provide:

- a. A list of the specific actions that the licensee will complete to meet item 1 of the Requested Actions for Operating Reactors provided in this supplement, including justifications as appropriate.
- b. The schedule for completing the licensee actions to meet item 1 of the Requested Actions provided in this supplement.
- c. When completed, a statement confirming that items 1 and 2 of the Requested Actions for Operating Reactors provided in this supplement have been completed.

FPL RESPONSE TO REPORTING REQUIREMENT 2 a:

1. The FPL actions for each portion of the Requested Action 1 are described below:

- 1.a. FPL has identified the safety-related Rosemount Model 1153 Series B, Model 1153 Series D, and Model 1154 transmitters manufactured before July 11, 1989, that have normal operating pressures greater than 1500 psi, and are installed in reactor protection system (RPS), ESF actuation systems, or ATWS systems.

The transmitters in this category located in Unit 1 systems are either scheduled to be replaced during the Spring 1993, Unit 1 refueling outage or were manufactured after July 11, 1989, (serial number greater than 500,000), therefore the monthly enhanced surveillance program is not required. Should the scheduled replacement of the affected transmitters be delayed beyond the Spring 1993 outage, FPL will monitor the affected transmitters on a monthly basis using an enhanced surveillance monitoring program. Prior to exercising the option to extend the enhanced surveillance interval to refueling cycle; FPL will prepare and provide a copy of the requested justification to the NRC.

The transmitters in this category installed in Unit 2 systems were manufactured after July 11, 1989, (serial numbers greater than 500,000), and are exempt from the enhanced surveillance program. Additional justification is not required.

- 1.b. FPL has identified the safety-related Rosemount Model 1153 Series B, Model 1153 Series D, and Model 1154 transmitters manufactured before July 11, 1989, that have normal operating pressures greater than 1500 psi, and are not installed in reactor protection system (RPS), ESF actuation systems, or ATWS systems.

The transmitters in this category located in Unit 1 systems are scheduled to be replaced during the Spring 1993, Unit 1 refueling outage, therefore the quarterly enhanced surveillance program is not required. Should the scheduled replacement of the affected transmitters be delayed beyond the Spring 1993 outage, FPL will monitor the affected transmitters on a quarterly basis using an enhanced surveillance monitoring program. Prior to exercising the option to extend the enhanced surveillance interval to refueling cycle, FPL will prepare and provide a copy of the requested justification to the NRC.

The transmitters in this category installed in Unit 2 systems were either manufactured after July 11, 1989, (serial numbers greater than 500,000), and exempt from the quarterly enhanced surveillance program, or FPL will monitor the transmitters using an enhanced quarterly surveillance program until they are replaced. FPL does not plan to utilize the option to monitor "mature" transmitters on the refueling cycle basis at this time, therefore no justification is provided. Prior to exercising the option to extend the enhanced surveillance interval to refueling cycle, FPL will prepare and provide a copy of the requested justification to the NRC.

- 1.c. FPL has identified the safety-related Rosemount Model 1153 Series B, Model 1153 Series D, and Model 1154 transmitters manufactured before July 11, 1989, that have

normal operating pressures greater than 500 psi but less than or equal to 1500 psi, and are installed in reactor protection system (RPS), ESF actuation systems, or ATWS systems.

FPL will monitor these transmitters at least once every refueling cycle, but not exceeding 24 months, using an enhanced surveillance program until they are replaced or until they reach their appropriate psi-month "mature" threshold criterion.

- 1.d. FPL has identified the safety-related Rosemount Model 1153 Series B, Model 1153 Series D, and Model 1154 transmitters manufactured before July 11, 1989, that have normal operating pressures greater than 500 psi but less than or equal to 1500 psi, and are not installed in reactor protection system (RPS), ESF actuation systems, or ATWS systems.

FPL will monitor these transmitters at least once every refueling cycle, but not exceeding 24 months, using an enhanced surveillance program until they are replaced or until they reach their appropriate psi-month "mature" threshold criterion.

Transmitters in this category manufactured after July 11, 1989, (serial numbers greater than 500,000), are exempt from the enhanced surveillance program.

- 1.e. FPL will exclude from the enhanced surveillance program safety-related transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi once they have reached the appropriate psi-month "mature" threshold criterion recommended by Rosemount and have shown no excessive drift or sluggish tendencies. The ability to detect failures will be further maintained by existing maintenance and surveillance programs.

- 1.f. FPL has identified the safety-related Rosemount Model 1153 Series B, Model 1153 Series D, and Model 1154 transmitters manufactured before July 11, 1989, that have normal operating pressures less than or equal to 500 psi. FPL will exclude these transmitters from the enhanced surveillance program. Should one of these transmitters fail due to loss of sensing oil fill, FPL has a high confidence level that existing maintenance and surveillance programs would detect the failure and they would be replaced. In this manner, safe plant operation would not be compromised.

Transmitters in this category manufactured after July 11, 1989 (serial number greater than 500,000) are exempt from any enhanced surveillance program.

FPL RESPONSE TO REPORTING REQUIREMENT 2 b:

The FPL schedules for each portion of Requested Action 1 are:

- 1.a. The affected Unit 1 transmitters in this category are scheduled to be replaced prior to startup for Cycle 12 currently scheduled for the Spring 1993.

Any of the affected transmitters in this category not replaced during the Unit 1 1993 refueling outage will be placed in the enhanced monthly surveillance program within 30 days of the startup for Cycle 12.

Requested action 1.a. is complete for Unit 2.

- 1.b. The affected Unit 1 transmitters in this category are scheduled to be replaced prior to startup for Cycle 12 currently scheduled for the Spring 1993.

Any of the affected transmitters in this category not replaced during the Unit 1 1993 refueling outage will be placed in the enhanced quarterly surveillance program within 90 days of the startup for cycle 12.

The affected Unit 2 transmitters in this category will be monitored until they are replaced on a quarterly basis using an enhanced surveillance program by April 15, 1993.

The affected Unit 2 transmitters in this category are scheduled to be replaced prior to startup for Cycle 8 currently scheduled for the Fall 1993.

- 1.c. The affected Unit 1 and Unit 2 transmitters in this category will be placed in the enhanced refueling cycle surveillance program by April 15, 1993.

- 1.d. The affected Unit 1 and Unit 2 transmitters in this category will be placed in the enhanced refueling cycle surveillance program by April 15, 1993.

- 1.e. The schedule for this action item is dependent on the individual transmitter, when it was installed and its pressure history. As transmitters in this category meet the conditions specified in the response to action item 1.e., they may be removed from the enhanced surveillance program.

- 1.f. Unit 1 and Unit 2 transmitters in this category are monitored by existing maintenance and surveillance programs. No further action is required.

FPL will notify the NRC Project Manager for St. Lucie, should any schedule changes be necessary.

FPL RESPONSE TO REPORTING REQUIREMENT 2 c:

FPL will notify the NRC Project Manager for St. Lucie when the Requested Actions Items 1 and 2 for both the St. Lucie Plant Units are complete. This is scheduled to be within 60 days of start-up from the Unit 2 cycle 8 refueling outage which is currently scheduled to begin in the Fall of 1993.

REPORTING REQUIREMENT 3:

A statement identifying those actions requested by the NRC that the licensee is not taking and an evaluation which provides the bases for not taking the requested actions.

FPL RESPONSE TO REPORTING REQUIREMENT 3:

FPL plans to conform to the applicable actions delineated in the NRCB supplement Requested Actions for Operating Reactors.



