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SAGER, D.A. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards Relief Request 13, "Repair Requirements for Class 2 Tank" for temporary non-code repair to Unit 1 RWT bottom for approval. Rev 1 to SE JPN-PSL-SENP-93-035, "Evaluation of Inventory Loss from RWT," St Lucie, Unit 1 also encl.

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July 30, 1993

L-93-190
10 CFR 50.4
10 CFR 50.55a

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

RE: St. Lucie Unit 1
Docket No. 50-335
In-Service-Inspection Plan
Second Ten-Year Interval
Relief Request 13 - Repair Requirements for Class 2 Tank

Pursuant to 10 CFR 50.55a(a)(3) and 50.55a(g)(5)(iii), Florida Power and Light Company (FPL) requests approval of relief request 13 "Repair Requirements for a Class 2 Tank" for a temporary non-code repair to the Unit 1 refueling water tank bottom.

FPL determined that an ASME Section XI Code repair is not practical in that the affected tank has a Technical Specification required water volume. In addition, a plant shutdown and cooldown with unnecessary cycling of facility systems and components would be required to perform a code repair of the tank bottom. The proposed alternatives provide an acceptable level of quality and safety, and that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Attachment 1 is Relief Request 13. Attachment 2 is a copy of the FPL Safety Evaluation (JPN-PSL-SENP-93-035, Revision 1) "Evaluation of Inventory Loss from the Refueling Water Tank."

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

Very truly yours,

D. A. SAGER
By H. J. Bailey
D. A. Sager
Vice President
St. Lucie Plant

DAS/GRM/kw

Attachments (2)

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

DAS/PSL #962-93

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St. Lucie Unit 1
Docket No. 50-335
In-Service-Inspection Plan
Second Ten-Year Interval
Relief Request 13 - Repair Requirements for Class 2 Tank

ATTACHMENT 1

**SECOND INSPECTION INTERVAL
ST. LUCIE UNIT 1
RELIEF REQUEST NUMBER 13**

A. COMPONENT IDENTIFICATION:

Class: Quality Group B Class 2
Identification of components: Refueling Water Tank
Description of components: Above Ground Storage Tank

B. EXAMINATION REQUIREMENTS:

Examination Category	Exam Item Number	Exam Method	Examination Requirement
C-H	C7.10	Visual VT-2	Pressure Retaining Boundary each inspection period
C-H	C7.20	Visual VT-2	Pressure Retaining Boundary at or near the end of the inspection interval

C. RELIEF REQUESTED:

Relief is requested from the Repair and/or Replacement requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1983 Edition through the Summer 1983 Addenda, Articles IWA/IWC-4000 and IWA/IWC-7000 respectively.

D. BASIS FOR RELIEF:

Florida Power and Light Company (FPL) has determined, based on the justification stated below, that the shutdown of the operating unit would be impractical for the sole purpose of making an ASME Code repair/replacement, and provide a undue hardship on FPL, without a compensating increase in the quality or safety of the plant for the following reasons:

1. FPL has determined that a code repair/replacement is not practical in that a plant shutdown and cooldown with unnecessary cycling of the facility systems and components would be required to perform a code repair/replacement to the tank bottom. In addition, the 500,000 gallons of borated water in the storage tank must be emptied into the refueling canal or temporary tankage during the repair/replacement.
2. Review of industry data indicates that tanks with comparable leaks do not fail catastrophically.
3. Leakage through the RWT bottom plate will not adversely affect the overall structural integrity of the RWT since it is not relied upon to transfer any design basis loads to the ring wall foundation.

**SECOND INSPECTION INTERVAL
ST. LUCIE UNIT 1
RELIEF REQUEST NUMBER 13**

4. Carbon steel structures or components are not located directly beneath the RWT or adjacent to it, the potential for carbon steel corrosion due to borated water is not applicable.

E. ALTERNATIVE EXAMINATIONS OR TESTS:

In lieu of the Code repair, FPL proposes the following:

1. A remote visual (VT-3) examination utilizing a submersible device was performed prior to the temporary repair.
2. The temporary repair is an epoxy sealant coating with an aluminum backing plate. This temporary repair has been determined to be compatible with the tank materials and system fluids.
3. Continued monitoring of the RWT level by Operations and Chemistry.
4. Any step increase in inventory loss (e.g., a 1 gpm increase) will be evaluated for makeup capability and continued operability of the RWT.

F. IMPLEMENTATION SCHEDULE:

This temporary repair to the tank bottom/liner is considered by FPL to be an intermediate measure. The RWT will be repaired in accordance with the ASME Code requirements during the Fall 1994 refueling outage.

St. Lucie Unit 1
Docket No. 50-335
In-Service-Inspection Plan
Second Ten-Year Interval
Relief Request 13 - Repair Requirements for Class 2 Tank

ATTACHMENT 2