



December 7, 1994

L-94-312
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
Reactor Protective System (RPS) Measurement Channel MD
Request for Enforcement Discretion

Florida Power & Light Company (FPL) requests the Nuclear Regulatory Commission (NRC) to exercise enforcement discretion with regard to St. Lucie Unit 1 Technical Specification (TS) 3.3.1.1, "Reactor Protective System," ACTION 2 by extending the maximum time duration for which an inoperable channel may be bypassed.

TS 3.3.1.1 ACTION 2 states in part "...the inoperable channel may be bypassed for: up to 48 hours from time of initial loss of OPERABILITY; however, the inoperable channel shall then be either restored to OPERABLE status or placed in the tripped condition."

On December 4, 1994, the Variable High Power Trip (VHPT) setpoint relay and indicating light on RPS Measurement Channel MD would not reset. Pursuant to TS 3.3.1.1, ACTION 2, RPS MD bistables for VHPT, Thermal Margin Low Pressure (TM/LP), Local Power Density and Loss of Load were placed in bypass for troubleshooting. Troubleshooting using standard RPS procedures has isolated the problem to Measurement Channel MD only. A root cause for the VHPT problem was not identified in the 48 hour time frame. On December 6, 1994, the above listed bistables were placed in the tripped condition.

FPL requests an additional 48 hours of cumulative bypass time for RPS Measurement Channel MD to take place over a period not to exceed 14 days. Exercising enforcement discretion will allow controlled use of the applicable Bypass switches during active troubleshooting and repair efforts. Bypass operation results in two-out-of-three logic for the RPS. This feature will reduce the risk associated with a potential inadvertent plant shutdown transient that would otherwise be present with Measurement Channel MD in the trip mode and the RPS operating in one-out-of-three logic.

Enclosure

941213224 3PP
an FPL Group company

St. Lucie Unit 1
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As compensatory measures, FPL will ensure that:

1. Bypass operation will only be used during periods of active troubleshooting.
2. The applicable Measurement Channel MD bistables will be placed in the trip condition whenever active troubleshooting is not in progress.
3. Operators remain aware of the loss of redundancy of RPS trip channels when operating with Measurement Channel MD in Bypass.
4. Unrelated work activities have been suspended on the RPS and associated plant systems.

For the following reasons, FPL has concluded that the proposed non-compliance with TS 3.3.1.1, ACTION 2, will not be of potential detriment to the public health and safety, and that a significant safety hazard is not involved.

1. The proposed non-compliance will involve only an extension of the allowed time duration for which bypass operation of a single inoperable RPS channel is permitted.
2. The RPS is not an accident initiator, and changes to the types of equipment used or the modes of operation authorized for the plant are not being made. Therefore, the probability of occurrence of an accident previously evaluated or the possibility of a different kind of accident previously evaluated will not be significantly increased.
3. During the period of Measurement Channel MD inoperability, the RPS trip logic will not significantly degrade the ability of the RPS to perform its design safety function. Therefore, the consequences of an accident previously evaluated will not be significantly increased.
4. The setpoints of the three operable RPS channels will be unaffected by the proposed non-compliance and, therefore, the margin of safety as defined in the basis for any technical specification will not be significantly reduced.

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5. The remaining three channels have been functionally tested and are operable.

It has been determined that the proposed request meets the criteria for categorical exclusion as provided for in 10 CFR 51.22(c). This request represents a change in a requirement with respect to facility instrumentation located within the restricted area. Therefore, this proposed non-compliance will not involve adverse consequences to the environment.

FPL believes that approval of this request will minimize the potential safety consequences of unnecessary plant transients associated with a planned shutdown and the operational risks and impacts associated with continued operation with a single channel in trip.

This Request for Enforcement Discretion was reviewed by the Facility Review Group on December 7, 1994.

Very truly yours,


D. A. Sager

Vice President
St. Lucie Plant

DAS/JWH/RLD

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

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SUBJECT: Requests NRC to exercise enforcement discretion w/regard to facility TS 3.3.1.1, "Reactor Protective Sys," ACTION 2 by extending max time duration for which inoperable channel may be bypassed.

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