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SUBJECT: Responds to verbal request during 941222 meeting between Westinghouse & NRC re SG tube mechanical plugs.Actions stated in prior response to NRC Bulletin 89-001, "Failure of Westinghouse SG Tube Mechanical Plugs" completed.

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Florida Power & Light Company, P.O. Box 128, Fort Pierce, FL 34954-0128

January 30, 1995

L-95-27
10 CFR 50.4

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

RE: St. Lucie Unit 1
Docket No. 50-335
NRC Bulletin 89-01
Supplemental Information on Westinghouse
Steam Generator Tube Mechanical Plugs

The actions stated in our prior responses to NRC Bulletin No. 89-01, "Failure of Westinghouse Steam Generator Tube Mechanical Plugs," FPL letters L-94-295 dated November 25, 1994 and L-89-223 dated June 19, 1989 have been completed.

The purpose of this letter is provide the Florida Power and Light Company (FPL) response to a verbal request for information during a meeting on December 22, 1994, between Westinghouse and the NRC Staff. It also completes an action requested during a conference call on November 14, 1994, to submit long term action plans for the subject plugs.

The response which includes the long range plan for the tube plugs is attached. As stated in the response to request 4, the tube plug repair plan for St. Lucie Unit 1 will be provided no later than 30 days prior to the next refueling outage. The next Unit 1 refueling outage (Cycle 13) is currently scheduled for the Spring of 1996.

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

Very truly yours,

D. A. Sager
Vice President
St. Lucie Plant

DAS/GRM

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

JE31

St. Lucie Unit 1
Docket No. 50-335
NRC Bulletin 89-01 -
Supplemental Information - Westinghouse
Steam Generator Tube Mechanical Plugs

ATTACHMENT

REQUEST 1

Identify the number of Westinghouse mechanical plugs manufactured from Inconel 600 Thermally Treated material present in your steam generators that have not been either changed out or repaired.

RESPONSE 1

The following table summarized the number of the subject tube plugs currently installed in the St. Lucie Unit 1 steam generators. There are no Westinghouse mechanical tube plugs installed in the St. Lucie Unit 2 steam generators.

STEAM GENERATOR	HOT LEG	COLD LEG
PSL-1A	255	265
PSL-1B	234	243

REQUEST 2

Reaffirm that operation of your plant with the identified plugs does not represent a safety issue.

RESPONSE 2

The Justification For Continued Operation (JCO) contained in the various revisions to WCAP-12244 are based on the following:

a) the low probability of a Plug Top Release (PTR) event,

b) the population of tubes which may perforate as a result of plug top release is limited,

c) should perforation occur following PTR, the primary to secondary leakage consequences are limited,

d) there is a very low likelihood that multiple plugs could be in a condition that would be capable of resulting in PTR, and

e) the plant Emergency Response Guidelines are adequate to bring the plant to safe shutdown following PTR.

None of the underlying conditions of the JCO have changed. Thus the JCO is still valid for the St. Lucie Unit 1 Steam Generators. Details of the site specific applicability of the JCO were previously submitted by FPL letter L-94-295 from D. A. Sager to USNRC dated November 25, 1994.

REQUEST 3

A commitment to evaluate and assess the impact of the Addendum 3 to WCAP-12244, to be issued by Westinghouse by January 31, 1995, on your existing action plan for addressing mechanical plug corrosion provided to the NRC in response to NRC Bulletin 89-01 and its supplements.

RESPONSE 3

FPL has performed remote tube sheet visual inspections of all installed tube plugs, regardless of manufacture, at each refueling outage subsequent to the issuance of NRC Bulletin 89-01. The most recent inspection at PSL-1 identified 15 leaking Westinghouse mechanical tube plugs which were subsequently replaced with welded Alloy 690 and resulted in the re-evaluation of the corrosion algorithm as will be reported in the revised WCAP-12244. The impact of Revision 3 on the remaining life of the subject plugs will be assessed as part of the FPL management plan for the tube plugs.

REQUEST 4

A commitment to issue to the NRC a schedule and revised action plan for your plant in addressing this issue 30 days prior to your next scheduled outage.

RESPONSE 4

FPL is currently assessing the impact of repairs to the subject plug versus the remaining life of the steam generators, currently scheduled for replacement in the Spring of 1998. This assessment will include technical justification for repairing only those plugs that are leaking, evaluation of all repair options and assessment of the impact of these options on ALARA. The tube plug repair plan will be submitted no later than 30 days prior to the next scheduled refueling outage for St. Lucie Unit 1. The next Unit 1 refueling outage (Cycle 13) is currently scheduled for the Spring of 1996.