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SUBJECT: Forwards encl demonstrating that all significant parameters of Draft Reg Guide, Steame Generator Tube Integrity, met for 14 months of operation, while top level criterion remains less than 0.05 for 15 month period of operation.

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October 24, 1996

L-96-273
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
Steam Generator Run Time Analysis for Cycle 14

During a July 3, 1996, meeting with the NRC, Florida Power and Light Company (FPL) committed to provide the results of the St. Lucie Unit 1 steam generator run time analysis to the NRC within 90 days of the startup from the 1996 refueling outage (SL1-14). FPL plans to operate the Unit 1 steam generators for fifteen (15) months through October 23, 1997. The run time analysis is a physically based analysis using the guidance contained in Draft Regulatory Guide (RG) 1.121, Generic Letter 95-05, and the Draft Regulatory Guide, *Steam Generator Tube Integrity*. The fifteen (15) month operating cycle represents a seven (7) month reduction in the originally scheduled cycle of twenty-two (22) months. This revised operating cycle length will permit the safe operation of the steam generators until the earliest date for the installation of the replacement steam generators.

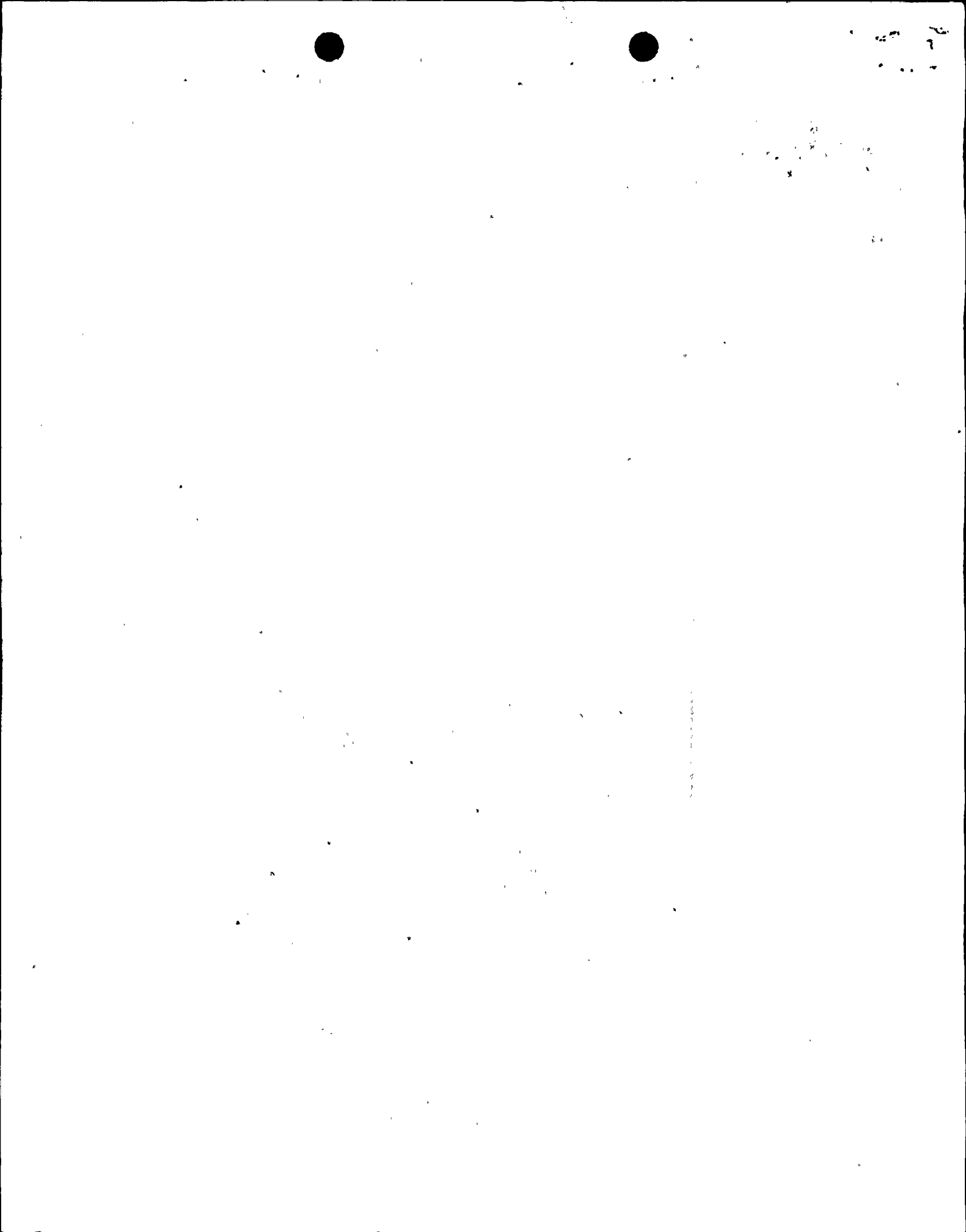
Enclosure 1 is the *St. Lucie Unit 1 Steam Generator Run Time Analysis for Cycle 14*. This run time analysis includes the responses to the NRC requests for additional information dated July 26, 1996. Enclosures 2, 3, and 4 are FPL contractor reports which are referenced in the steam generator run time analysis. Enclosure 2 is APTECH Engineering Services Report, AES 96052749-1-1, dated October 1996, *Analysis of ODS/IGA at Tubesheet and Tube Support Locations at St. Lucie Unit 1*. Enclosure 3 is Scientific Applications International Corporation (SAIC) Report, SAIC 05-5049-05-6734-500, dated September 1996, *Steam Generator Degradation Specific Management (SGDSM) Leakage Limit Calculation for St. Lucie Unit 1*. Enclosure 4 is ABB Combustion Engineering Report, 00000-OSW-16 Revision 0, *In-situ Pressure Test Results for St. Lucie Unit 1 Spring 1996 Outage*.

The enclosures demonstrate that all of the significant parameters of the Draft Regulatory Guide, *Steam Generator Tube Integrity*, have been met for fourteen (14) months of operation, while the top level criterion (probability of burst (POB) at main steam line break conditions) remains less than 0.05 for the fifteen (15) month period of operation. A probabilistic safety assessment (PSA) demonstrates that operation for the additional month does not increase the core damage frequency (CDF) into the safety significant category. The inclusion of the EPRI primary to secondary leak guidelines in plant operating procedures and increased training of the licensed operators, as documented in the enclosures, provides FPL's commitment to respond to possible tube leak events. An additional benchmark of the planned cycle length is provided by the end of Cycle 13 in-situ pressure testing. This testing demonstrated that steam generator tubes with representative worst case defects met the requirements of Draft RG 1.121 after 13.9 effective full power months (EFPM) of operation.

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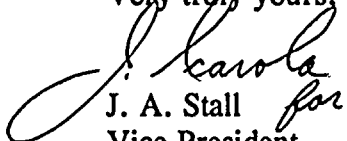


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In summary, FPL considers that safe operation of the St. Lucie Unit 1 steam generators for fifteen (15) months through October 23, 1997, is supported by the enclosed run time analysis, the end of Cycle 13 repairs and in-situ pressure testing, the incorporation of more restrictive operational tube leakage limits, and the enhanced operator training.

As discussed at the July 3, 1996 meeting, FPL is prepared to meet with the NRC to discuss the results of the analyses once the NRC Staff has had an opportunity to review this material.

Very truly yours,


J. A. Stall *for*
Vice President
St. Lucie Plant

JAS/GRM

Enclosures (4)

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

