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SUBJECT: Provides rev to 120-day response, L-97-18 dtd 970128, to  
 GL-96-06, "Assurance of Equipment Operability & Containment  
 Integrity During Design-Basis Accident Conditions," for  
 plant.

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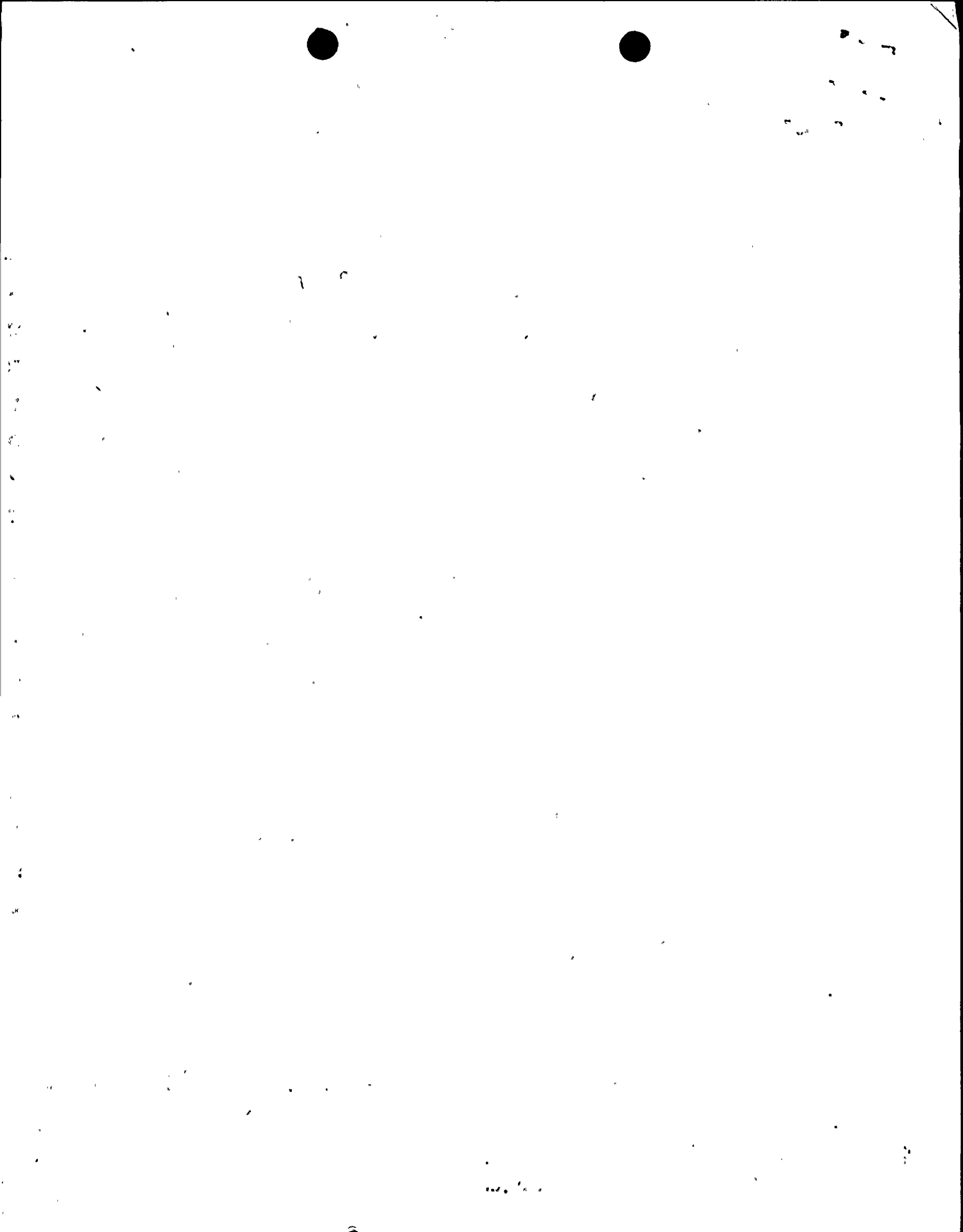
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April 22, 1997

L-97-114  
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 Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Revised Commitment  
Generic Letter 96-06

This letter provides a revision to the Florida Power & Light Company (FPL) 120-day response, L-97-18 dated January 28, 1997, to NRC Generic Letter (GL) 96-06 "*Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions*" for St. Lucie Units 1 and 2.

The GL requested that within 120 days of September 30, 1996, FPL submit a written summary report stating the actions taken in response to the GL, the conclusions that were reached relative to susceptibility for water hammer and two-phase flow in the containment air cooler cooling water system and overpressurization of piping that penetrate containment, the basis for continued operability of the affected systems and components, and the corrective actions implemented or that are planned to be implemented. If systems were found to be susceptible to the conditions that were discussed in the generic letter, FPL was to identify the systems affected and describe the specific circumstances involved.

FPL did not identify any piping susceptible to water hammer or two-phase flow in the containment air cooler cooling water system. The evaluation did identify piping sections for containment penetrations and pipe sections inside containment that could be vulnerable to thermal overpressurization. Each of the identified cases which provide containment integrity or other safety related functions were analyzed for functional operability using the basis of the acceptance criteria contained in ASME Section III Appendix F, *Rules for Evaluation of Service Loadings with Level D Service Limits*, as provided for within NRC Generic Letter 91-18, *Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability*. The results indicated that all affected piping and valves within both units will remain functional with no violation of the pressure retaining boundary under accident conditions. FPL considered the operability assessments contained in the summary report to be valid for the current operating cycle of each unit and if necessary, due to NRC review schedules, the next operating cycle of each unit. The purpose of this letter is to revise FPL's planned corrective actions.

With respect to thermal overpressurization of isolated piping, FPL committed to submit a proposed license amendment to incorporate into the Updated Final Safety Analysis Report

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St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
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(UFSAR), the methodology of ASME Section III, Appendix F for use in analyzing isolated piping sections in containment under post accident conditions. The proposed license amendment was scheduled to be submitted by April 30, 1997.

During FPL's evaluation of GL 96-06, consideration was given to the implementation of several system modifications and/or procedure changes to drain piping sections to resolve the GL 96-06 issues of thermal overpressurization of isolated piping. FPL has further considered system modifications (e.g., rupture disks, accumulators, or thermal relief valves) and is committing to implement modifications and/or procedure changes in response to GL 96-06 in lieu of the previous commitment to submit a license amendment incorporating the methodology of ASME Section III, Appendix F into the St. Lucie Unit 1 and Unit 2 UFSARs. This strategy would restore affected piping and supports to the criteria stated in the St. Lucie UFSARs.

With respect to completing modifications at the first practical opportunity, the St. Lucie Unit 2 Spring 1997 Refueling Outage (SL2-10) commenced on April 14, 1997. It is not prudent to implement modifications during this outage since the design packages must be prepared, material procured, construction activities planned, scheduled and implemented. This process cannot be performed in an effective and controlled manner prior to the restart from the Spring 1997 Refueling Outage. Based on the scheduled completion of the Unit 2 Refueling Outage, implementation of the thermal overpressurization modifications are scheduled for the Fall 1998 Unit 2 Refueling Outage (SL2-11). Procedure changes to drain specific piping sections will be implemented prior to power ascension from the Spring 1997 Unit 2 refueling outage (SL2-10). Similar modifications or procedure changes are scheduled for the Fall 1997 Unit 1 Refueling Outage (SL1-15).

FPL considers the operability assessments contained in the original submittal, L-97-18 dated January 28, 1997, to be valid for the current operating cycle (cycle 14) of Unit 1 and the next operating cycle (cycle 10) of Unit 2. Please contact us if there are any questions about this submittal.

Very truly yours,



J. A. Stall  
Vice President  
St. Lucie Plant

JAS/GRM

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

